

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

WATCHY TECHNOLOGY PRIVATE  
LIMITED,

*Plaintiff,*

V.

TVU NETWORKS CORPORATION.

*Defendant.*

C.A. No. 23-463 (CFC)

**STIPULATION AND [PROPOSED] ORDER TO STAY PENDING DISMISSAL**

WHEREAS Plaintiff Watchy Technology Private Limited (“Watchy”) and Defendant TVU Networks Corporation (“TVU”) have reached an agreement in principle to resolve the remainder of this case;

WHEREAS the Parties need additional time to finalize the terms of their agreement and

dismiss the case;

IT IS HEREBY STIPULATED AND AGREED by and between the Parties through their undersigned counsel, and subject to the approval of the Court, that all deadlines in this case are stayed pending dismissal of this action.

Dated: October 18, 2023

/s/ John C. Phillips, Jr.

John C. Phillips, Jr. (#110)  
David A. Bilson (#4986)  
1200 North Broom Street  
PHILLIPS, MCLAUGHLIN & HALL, P.A.  
Wilmington, Delaware 19806  
(302) 655-4200  
jcp@pmhdelaw.com  
dab@pmhdelaw.com

Shea N. Palavan

**houstonip**

5353 West Alabama Street, Suite 303  
Houston, Texas 77056  
Newport Beach, California 92660  
Telephone: (832) 303-0704  
Facsimile: (855) PALAVAN (725-2826)  
shea@houstonip.com

*Attorneys for Plaintiff,  
Watchy Technology Private Limited*

/s/ Cortlan S. Hitch

Kenneth L. Dorsey (#3726)  
Cortlan S. Hitch (#6720)  
MORRIS JAMES LLP  
500 Delaware Avenue, Suite 1500  
Wilmington, Delaware 19801  
(302) 888-6800  
kdorsney@morrisjames.com  
chitch@morrisjames.com

*Attorneys for Defendant,  
TVU Networks Corporation*

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
United States District Court Chief Judge